

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)
21 MC 103 (AKH)

THIS DOCUMENT APPLIES TO ALL CASES
IN THE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION
SET FORTH ON SCHEDULE A HERETO

STIPULATION AND ORDER FOR
SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
that the firm of McGuireWoods LLP, 1345 Avenue of the Americas, 7th Floor, New York, New
York 10105-0106, be substituted as counsel for record for defendant Battery Park City Authority
in the cases set forth on Schedule A hereto (with respect to the claims therein involving Two
World Financial Center (225 Liberty Street) and/or Four World Financial Center (250 Vesey
Street)), in place and in stead of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP.

Dated: May __, 2012

WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP

McGUIREWOODS LLP

By: John M. Flannery
John M. Flannery (JF 0229)
3 Cannett Drive
White Plains, New York 10604
Tel.: (914) 323-7000
Fax: (914) 323-7001

By: Philip Goldstein
Philip Goldstein (PG 4770)
1345 Avenue of the Americas
New York, New York 10105-0106
Tel.: (212) 548-2100
Fax: (212) 548-2150

Former Attorneys for
BATTERY PARK CITY AUTHORITY

Substituting Attorneys for
BATTERY PARK CITY AUTHORITY

SO ORDERED:

Alvin K. Hellerstein
Hon. Alvin K. Hellerstein, U.S.D.J.

6-21-12

gjs

Schedule A
21MC102

Name	Case No.
Balcer, Waldemar	06CV05325
Cardenas, Carlos	10CV06907
Ciborowski, Henryk	10CV04226
Cieslak, Romuald	05CV06240, 05CV06285
Ginter, Janusz	06CV05337
Glowaty, Marek	09CV10591
Koszelnik, Anatol	06CV05283
Lelek, Antoni	10CV06862
Maksimiuk, Marina	06CV05291
Matuszewski, Piotr	06CV01514
Miroschnychenko, Oleksiy	10CV06883
Muszkatel, Jerzy	06CV05285
Perzynska, Irena	06CV05345, 10CV06900
Portilia, Lucila	10CV06870
Puello, Maria	07CV11294
Socha, Marek	09CV00680
Sowa, Mieczyslaw	05CV02446
Zdanowicz, Jan	09CV02258
Zietek, Andrej	09CV03770

21MC103

Name	Case No.
Chapman, Robert	10CV01372, 10CV06908
Espinoza, Alonso	08CV09720, 10CV06902
Galazka, Joseph	10CV06903
Kacperski, Zbigniew	10CV06906

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION	X	21 MC 102 (AKH) 21 MC 103 (AKH)
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THIS DOCUMENT APPLIES TO ALL CASES IN THE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION SET FORTH ON SCHEDULE A HERETO	X	AFFIDAVIT OF PHILIP GOLDSTEIN IN SUPPORT OF <u>SUBSTITUTION OF COUNSEL</u>
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State of New York)
)ss.:
County of New York)

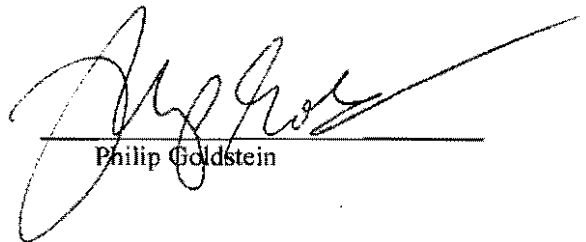
PHILIP GOLDSTEIN, being duly sworn, deposes and says:

1. I am a member of the Bar of the State of New York and of the United States District Court for the Southern District of New York, and am a partner with the firm of McGuireWoods LLP. I submit this affidavit pursuant to Rule 1.4 of the Local Rules of the Southern and Eastern Districts of New York, in support of the accompanying Stipulation and Order for Substitution of Counsel.

2. McGuireWoods LLP currently represents 21MC102 defendants Merrill Lynch & Co., Inc. ("Merrill Lynch") and 222 Broadway LLC and is one of the firms in the Co-Defense Liaison Counsel Group. Pursuant to the indemnification provisions in the leases for Two and Four World Financial Center, Battery Park City Authority has requested that McGuireWoods LLP be substituted as counsel of record in the cases set forth on Schedule A to the Stipulation and Order for Substitution of Counsel, with respect to the claims in those cases involving Two and/or Four World Financial Center.

3. No trial date has yet been set in any of these cases.

4. McGuireWoods LLP already is representing Merrill Lynch in connection with all but one of the cases listed on Schedule A and accordingly, the substitution of counsel will not result in any prejudice or delay.



Philip Goldstein

Sworn to before me this
1st day of June, 2012.



Notary Public

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EILEEN CHIN
Notary Public, State of New York
No. 01CH8075750
Qualified in New York County
Commission Expires June 10, 2014